

WIGDOR LLP

ATTORNEYS AND COUNSELORS AT LAW

85 FIFTH AVENUE
NEW YORK, NY 10003
TEL 212.257.6800
FAX 212.257.6845
WWW.WIGDORLAW.COM

Bryan L. Arbeit
barbeit@wigdorlaw.com

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VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
40 Center Street – Courtroom 228
New York, New York 10007

Re: Bradford Bodine v. Canaccord Genuity Inc., et al.; No.: 15-cv-3019(JGK)(NKF)

Dear Judge Koeltl:

We represent Plaintiff Bradford Bodine in the above-referenced action. We write to respectfully request an adjournment *sine die* of time to oppose Defendants' motion to dismiss. Pursuant to Your Honor's Order dated July 27, 2015 (Dkt. No. 14), the current deadline to oppose Defendants' motion to dismiss filed on August 14, 2015 is September 18, 2015. Over the last month, Plaintiff has worked expeditiously to conduct discovery limited to the issue of subject-matter jurisdiction as permitted by the Court. (Dkt. No. 14). However, the parties disagree over the relevance of many of requested documents and information and need the deposition of Defendant Daniel Daviau in order to oppose Defendants' motion to dismiss. Plaintiff is filing a motion to compel certain documents and the deposition of Mr. Daviau following this request for an extension. In light of the motion to compel, and need time to conduct additional discovery if it is granted, Plaintiff requests that any opposition to Defendants' motion to dismiss be adjourned *sin die* pending resolution of Plaintiff's motion to compel. At which time, we ask the Court to set a new briefing schedule for Plaintiff's opposition and Defendants' reply. This is the first request for an extension of the motion to dismiss briefing scheduling and counsel for Defendants consented to this request.

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,



Bryan L. Arbeit